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April 7, 2025

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Denim Tears, LLC v. Shenzhen Xiaotangren Technology Co., Ltd., et al.
Case No. 24-cv-5675 (AKH)
Second Letter Request to Adjourn Preliminary Injunction Hearing

Dear Judge Hellerstein,

We represent Plaintiff Denim Tears, LLC ("Plaintiff") in the above-referenced action (the "Action"). By Order dated April 1, 2025, the Court granted the parties' request to adjourn the preliminary injunction hearing to April 9, 2025 at 11:00 a.m. Unfortunately, Plaintiff's counsel has a conflict on April 9, 2025 and respectfully requests to adjourn the preliminary injunction hearing.

In accordance with Your Honor's Individual Rules, Plaintiff submits the following:

- i. **The Original Date:** April 9, 2025 at 11:00 a.m.;
- ii. **The Number of Previous Requests for Adjournment:** The parties requested to adjourn the continued preliminary injunction hearing twice to engage in settlement discussions, but this is the second request to adjourn the preliminary injunction hearing after the supplemental briefing has been filed;
- iii. **Whether Previous Requests Were Denied/Granted:** The Court granted the parties' previous requests;
- iv. **Whether Adversary Consents:** Plaintiff's counsel conferred with counsel for Defendants who consents to Plaintiff's request;
- v. **All Other Dates Previously Scheduled:** None;
- vi. **Proposed Alternate Dates:** After conferring with counsel for Defendants and contacting Your Honor's Chambers for the Court's availability, the parties are available to appear for a preliminary injunction hearing on April 23, 2025 or April 24, 2025.

Plaintiff further respectfully requests that the relief granted in the temporary restraining order be extended through the date of the rescheduled hearing on Plaintiff's Application for a preliminary injunction order.

The motion for preliminary injunction will be heard April 24, 2025, at 10:00 a.m. The current hearing date April 9, 2025, is adjourned. Since the 10:00 a.m. hearing is adjourned, it cannot be extended except it accepted by all def's. 4-7-25

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We thank the Court for its time and consideration.

Respectfully submitted,
EPSTEIN DRANGEL LLP

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